## LAGOMARSINO LAW

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ANDRE M. LAGOMARSINO, ESQ. 3005 W. Horizon Ridge Pkwy., Suite 241

Henderson, Nevada 89052 Telephone: (702) 383-2864 Facsimile: (702) 383-0065 aml@lagomarsinolaw.com

Attorney for Plaintiff Lewis Stewart

# UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

LEWIS STEWART, an individual,

Plaintiff-Appellee

v.

ROMEO ARANAS; JAMES COX; FRANCISCO M. SANCHES; BRIAN E. WILLIAMS,

Defendants – Appellants,

and

CHERYL BURSON; S.L. CLARK; JAMES E. DZURENDA; ANGIE JONES; SEAN SU; STATE OF NEVADA

Defendants.

Case No.: 3:17-cv-00132-MMD-CLB

STIPULATION AND ORDER TO EXTEND PLAINTIFF'S DEADLINE TO FILE HIS RESPONSE TO DEFENDANTS' MOTION TO STRIKE PORTIONS PLAINTIFF'S REPLY (ECF NO. 81)

(First Request)

WHEREAS Defendants Romeo Aranas, James Cox, Francisco Sanchez and Brian Williams collectively filed their *Motion to Strike Portions of Plaintiff's Reply* (ECF No. 81) on August 24, 2020 relating to *Plaintiff's Reply to his Motion to Vacate the Stay Pending Appeal and Request to Certify Appeal as Frivolous* (ECF No. 79) on August 4, 2020.

Pursuant to Local Rule IA 6-1(a), the parties hereby stipulate to extend the deadline for plaintiff to file his response to defendants' motion. The current deadline for plaintiff to respond to defendants' motion is **September 8, 2020**. The new deadline for plaintiff to respond to defendants' motion will be **September 18, 2020**.

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Good cause exists because one (1) of plaintiff's associate attorneys has suddenly been quarantined due to a possible exposure to COVID-19. As a firm of only three (3) attorneys, the attorney that was tasked with drafting the response brief has had to cover the caseload for the quarantined attorney resulting in a delay to draft the response. This unexpected coverage includes coverage for multiple depositions, Equal Employment Opportunity Commission mediations and additional briefing and discovery efforts on other matters that would have been otherwise allocated for the drafting of a response brief.

This extension is the first request for an extension and is not submitted for the purpose of delay.

#### IT IS SO STIPULATED AND AGREED.

DATED this 8th day of September, 2020.

DATED this 8th day of September, 2020.

OFFICE OF THE ATTORNEY GENERAL

### LAGOMARSINO LAW

/s/ Andre M. Lagomarsino Andre M. Lagomarsino, Esq. (#6711)

3005 W. Horizon Ridge Pkwy., #241 Henderson, Nevada 89052 Attorney for Plaintiff Lewis Stewart

/S/ Frank Toddre II Frank Toddre II, Esq.

555 East Washington Avenue, Suite 3900

Las Vegas, Nevada 89101

Attorney for Defendants Romeo Aranas, James Cox, Francisco Sanchez and Brian Williams

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

DATED: September 10, 2020